

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: Jeffrey Lynn Goss  
Debtor,

JPMorgan Chase Bank, National Association  
Movant.

v.

Jeffrey Lynn Goss  
Debtor/Respondent,

Jack N. Zaharopoulos, Trustee  
Additional Respondent.

BANKRUPTCY CASE NUMBER  
18-04257/MJC

CHAPTER 13

**REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE<sup>1</sup>**

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance<sup>2</sup>.

Reason for the continuance: Parties agree to allow time for a Stipulation Workout; the property I spending a motion to sell and pay the movant in full.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: December 9, 2021

Respectfully submitted,  
/s/ Kristen D. Little

BY: \_\_\_\_\_  
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<sup>1</sup> No alterations or interlineations of this document are permitted.

<sup>2</sup> If this is not a first request for a continuance, then a Motion to Continue must be filed.